

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DISH NETWORK, LLC,

Case Action No.: 1:21-CV-05730-AMD-RML

Plaintiff,

-Against-

786 WIRELESS WORLD, INC. 786 ENTERPRISES,
INC., RANA M. AFZAL, and DOES 1-10,

**AFFIDAVIT
OF MERITS**

Defendant(s).

STATE OF NEW YORK)
) ss
COUNTY OF KINGS)

RANA M. AFZAL being duly sworn deposes and says:

1. That I am an officer of defendant 786 ENTERPRISES INC. and the individual defendant named in the Summons and Complaint.
2. That the complaint is confusing as it combines 786 WIRELESS WORLD INC. and 786 ENTERPRISES IN (collectively).
3. 786 ENTERPRISES, INC. has a place of business located at 1061 Coney Island Avenue, Brooklyn, New York, as does two (2) other stores, including 786 WIRELESS WORLD INC., with that address.
4. That 786 WIRELESS WORLD INC. sublets its space from 786 ENTERPRISES.
5. That the defendant 786 ENTERPRISES or affiant having nothing to do with 786 WIRELESS at all.
6. That affiant is not the Chief Executive Officer of 786 WIRELESS as alleged or has any connection with WIRELESS in any capacity except that 786 WIRELESS sublets its storefront.
7. Affiant has nothing to do with the Doe defendants.
8. 786 ENTERPRISES has nothing to do and has never done any business with plaintiff.
9. That affiant has never actively promoted or sold set-top boxes that came preloaded with the infringing service.

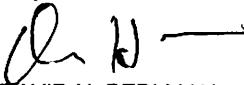
10. That affiant never had knowledge and never promoted the sale of the infringing services of DISH's exclusive rights to distribute and publicly perform the protected channels, as alleged in the complaint.

WHEREFORE, your affiant respectfully requests an order of the court opening up vacating defendants, 786 ENTERPRISES INC. and RANA M. AFZAL, default and extending the time for the filing of the answer (filed on February 8, 2022) and such other and further relief as to the court may seem just and proper.



RANA M. AFZAL

Sworn to before me this
11 day of August, 2022



DAVID H. PERLMAN
Notary Public, State of New York
No. 02PE6046530
Qualified in Kings County
Commission Expires August 14, 2026